



Defense Reutilization & Marketing Service

Phase I/II Audit Trail Verification

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HW Audit Trail Background – 1987 100% Cradle to Grave Tracking

- Contractors provide proposed facility & transporter listings for each solicitation/contract
- Disposal Date Confirmed by Certificate of Disposal/Recycling
- Contractors submit DRMS 1683 and supporting documentation after disposal of HW
- Manifest trackers review all lines manually and confirm proper disposal for payment



HW Audit Trail Background – 1987 100% Cradle to Grave Tracking

- Advantages
 - Met mandate for 100% HW Tracking
 - Met DEMIL Destruction requirements for HW
- Disadvantages
 - Time consuming for both DRMS & HW Partners
 - Unnecessary tracking for non-RCRA
 - Did not reduce HW liability
 - Increased cost for unnecessary CDs
 - Significant capital requirements for 8A HW firms



HW Audit Trail Background – 2000

Phase I/II Manifest Tracking – US locations

- International HW disposal – Still in 1984
- DRMS Maintains qualified facility & transporter listings on the WWW
- Disposal facility acceptance date acceptable for RCRA audit trail
 - Acceptance date at 1st facility OK for non-RCRA
 - CDs still required for PCBs & at Generator Request (new HIN)
- DRMO CORs load PMF data into BOSS (Phase I)
- Contractors provide proof of receipt at first facility and load IMF and DMF data into BOSS (Phase II)
- Manifest trackers review all lines through BOSS and confirm receipt at 1st facility for payment (Phase I)
- Contractors provide Phase II supporting documentation upon request



HW Audit Trail Background – 2006 GAO DEMIL & HW Disposal

- Phase I/II Advantages
 - Significant Cost Reductions
- Concerns
 - Significant Contractor Phase II Backlog (30%+ overage)
 - Three year backlog in Manifest Tracking 100% Phase II reviews
 - Not meeting 100% HW audit trail mandate
 - No DEMIL CD requirement
 - Facility & Transporter annual audits not timely
 - Facility on-site visits not based on risk/liability
 - Phase II completion/accuracy not quantified for past performance.



HW Audit Trail Background – 2007

Improve Phase II Manifest Tracking

- Validate the Process
 - Quarterly reviews of Contractor Phase II overage performance
 - Quarterly requests for Phase II supporting documentation based on sampling and audit trail concerns
- Focus on What is Important
 - Clean up qualified listings - remove unnecessary/outdated subcontractors quarterly
 - Annual desk audits of facilities & transporters actually used
 - Site visits based on concerns raised by Phase II and facility desk audits
 - Require CDs for DEMIL HW



HW Audit Trail Current Situation

- OCONUS – David Lee Roth still lead singer for Van Halen (Stuck in 1984)
 - No Qualified listings
 - No centralized facility/transporter files
 - Payment on disposal verification
 - Trackers loading all manifests into BOSS
 - No proper waste stream vs disposal/treatment verification
 - EPA manifest form irrelevant (obsolete & signed as received at removal)
 - No proper HW DEMIL audit trail/certification
 - Basel Requires CDs
 - Contractors not providing advanced copies of shipping documentation to COR
 - COR receives no IMDG/ADR documentation



HW Audit Trail Future

- Centralize & Standardize OCONUS manifest tracking (get rid of the big hair!)
- Improve processes without affecting 100% cradle-to-grave tracking of HW
- Data transfer of pickup, interim and disposal information from contractor databases to Reutilization Business Integration (RBI)